

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,	)	No. 3:17-01362
	)	
Plaintiff,	)	
	)	
vs.	)	Hon. David A. Faber
	)	
AMERISOURCEBERGEN DRUG CORPORATION, et al.,	)	
	)	
Defendants.	)	
	)	
<hr style="border: 0.5px solid black;"/>		
CABELL COUNTY COMMISSION,	)	No. 3:17-01665
	)	
Plaintiff,	)	
	)	
vs.	)	Hon. David A. Faber
	)	
AMERISOURCEBERGEN DRUG CORPORATION, et al.,	)	
	)	
Defendants.	)	
	)	
<hr style="border: 0.5px solid black;"/>		

**PLAINTIFFS' NOTICE OF ORAL VIDEOTAPED EXPERT DEPOSITION  
OF THANI JAMBULINGAM, PH.D.**

PLEASE TAKE NOTICE that, pursuant to the applicable Federal Rules of Civil Procedure and the Deposition Protocol governing this litigation, Plaintiffs, by and through the undersigned counsel, will take the oral videotaped deposition of Thani Jambulingam, Ph.D., on September 16, 2020, beginning at 9:00 a.m. Eastern Daylight Time. Court reporting services and video recording services will be provided by Golkow Global Litigation Services via alternative video conferencing (VTC) services (Zoom). Parties who wish to access the deposition are asked to contact [scheduling@golkow.com](mailto:scheduling@golkow.com), which will provide access codes prior to the deposition.

This deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. Plaintiffs reserve the right to seek additional time pursuant to any failure by Defendants to timely provide any supporting materials or data related to the expert report of Dr. Jambulingam.

The oral examination is to be taken for purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, the local rules of the United States District Court for the Southern District of West Virginia, and all Pretrial Orders and Case Management Orders entered by this Court. Court reporting services and video recording services will be provided by Golkow Global Litigation Services.

A request for records is attached as Exhibit A.

DATED: September 9, 2020

**THE CITY OF HUNTINGTON**

**CABELL COUNTY COMMISSION**

---

s/ Anne McGinniss Kearse  
ANNE MCGINNISS KEARSE

---

s/ Paul T. Farrell, Jr.  
PAUL T. FARRELL, JR.

Anne McGinness Kearse (WVSB 12547)  
Joseph F. Rice  
MOTLEY RICE LLC  
28 Bridgeside Boulevard  
Mount Pleasant, SC 29464  
Telephone: 843/216-9000  
843/216-9450 (fax)  
akearse@motleyrice.com  
jrice@motleyrice.com

Paul T. Farrell, Jr. (WVSB 7443)  
FARRELL LAW  
422 Ninth Street, Third Floor (25701)  
P.O. Box 1180  
Huntington, WV 25714-1180  
Mobile: 304/654-8281  
paul@farrell.law

s/ Anthony J. Majestro  
\_\_\_\_\_  
ANTHONY J. MAJESTRO

Linda Singer  
David I. Ackerman  
MOTLEY RICE LLC  
409 Ninth Street NW, Suite 1001  
Washington, DC 20004  
Telephone: 202/232-5504  
202/386-9622 (fax)  
lsinger@motleyrice.com  
dackerman@motleyrice.com

Charles R. "Rusty" Webb (WVSB 4872)  
THE WEBB LAW CENTRE, PLLC  
716 Lee Street East  
Charleston, WV 25301  
Telephone: 304/344-9322  
304/344-1157 (fax)  
rusty@rustywebb.com

Anthony J. Majestro (WVSB 5165)  
POWELL & MAJESTRO, PLLC  
405 Capitol Street, Suite P-1200  
Charleston, WV 25301  
Telephone: 304/346-2889  
304/346-2895 (fax)  
amajestro@powellmajestro.com

Michael A. Woelfel (WVSB 4106)  
WOELFEL AND WOELFEL, LLP  
801 Eighth Street  
Huntington, WV 25701  
Telephone: 304/522-6249  
304/522-9282 (fax)  
mikewoelfel3@gmail.com

**EXHIBIT A**

Pursuant to the Rule 26(e) of Federal Rules of Civil Procedure, this will serve as a request for the Deponent to supplement his Rule 26(a)(2) report and produce the following documents prior to or at the deposition:

1. All documents or other materials you reviewed since the date of your report that you have not specifically identified in your report in preparation for your expected testimony.
2. A statement of the compensation to be paid for your study and testimony in this case.
3. A copy of the most current and accurate *curriculum vitae* (C.V.) as of the date of your deposition.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 9, 2020, a copy of the foregoing **PLAINTIFFS' NOTICE OF ORAL VIDEOTAPED EXPERT DEPOSITION OF THANI JAMBULINGAM, PH.D.**, has been filed electronically using the Court's CM/ECF system and will be served via the Court's CM/ECF filing system, which will send notification of such filing to the attorneys of record at their e-mail addresses on file with the Court.

\_\_\_\_\_  
s/ Anthony J. Majestro  
ANTHONY J. MAJESTRO